1 2 3 4 5 6 7	SIGAL CHATTAH United States Attorney District of Nevada Nevada Bar Number 8264 SKYLER H. PEARSON Assistant Unites States Attorney 501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101 Tel: (702) 388-6336 Skyler.Pearson@usdoj.gov Attorneys for the United States
8	UNITED STATES DISTRICT COURT IN AND FOR THE DISTRICT OF NEVADA
10	UNITED STATES OF AMERICA,)
11	Plaintiff,
12) Case No.: 2:24-mj-0677-DJA
13	v.) STIPULATION TO CLOSE CASE
14	PEDRO HERNANDEZ-PEREZ,)
15	Defendant.)
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17	IT IS STIPULATED AND AGREED, by and between SIGAL CHATTAH, United
18	States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the United
19 20	States of America, and Frank Coumou, Esquire, and Tanner Harris, Esquire counsels for
21	defendant Pedro Hernandez-Perez, that the above-captioned matter be closed.
22	This Stipulation is entered into based upon the following:
23	1. On or about January 29, 2025, defendant entered into a Petty Offense
24	Agreement with the United States in which he agreed to plead guilty to Count One of the
25	Complaint, Operating a Motor Vehicle while Under the Influence of Alcohol, in violation of
26	36 C.F.R. § 4.23(a)(1) See ECF No. 12.
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- 2. The parties agreed to recommend that defendant be sentenced to one year of unsupervised probation with the following special conditions: (i) pay a \$500.00 fine and a mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court Counseling's (1) DUI course and (2) Victim Impact Panel; (iii) shall complete an eight (8) hour online alcohol awareness course; (iv) not return to Lake Mead National Recreation Area for a period of six (6) months; and (v) not violate any local, state, or federal laws for a period of six (6) months. If the defendant successfully completes his obligations within six months of unsupervised probation, the court will allow the defendant to withdraw his guilty plea to count one and the government will move to amend count one to reckless driving.
- 3. On January 29, 2025, this Court sentenced defendant pursuant to the parties' plea agreement. See ECF No. 12.
- 4. Since commencing his term of unsupervised probation, defendant has successfully completed conditions (i), (ii), (iii), (iv) and (v).

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As such, the parties jointly request that the defendant be allowed to withdraw 1. his guilty plea to count one and the government moves to amend count one to reckless driving. The parties also jointly request that the above-captioned matter be closed. DATED this 24th day of July, 2025. Respectfully submitted, SIGAL CHATTAH United States Attorney _/s/ Frank Coumou /s/ Skyler Pearson_ FRANK COUMO, ESQ. SKYLER PEARSON TANNER HARRIS, ESQ. Assistant United States Attorney Attorneys for Defendant PEDRO HERNANDEZ-PEREZ

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ORDER

IT IS HEREBY ORDERED that the defendant is allowed to withdraw his guilty plea to count one and that the count one be amended to reckless driving.

IT IS HEREBY ORDERED that the parties move the Court in the above-captioned matter case be closed, as all requirements have been completed.

DATED this 24th day of July, 2025

UNITED STATES MAGIS TRATE JUDGE